

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

KONNECH, INC., §  
§  
Plaintiff, § Civil Action No. 4:22-cv-03096  
§  
v. §  
§  
TRUE THE VOTE, INC., *et al.*, §  
§  
Defendants. §

**DEFENDANTS' OPPOSED MOTION TO SEAL**

Defendants move this honorable Court to seal Plaintiff's Exhibit 1 to the hearing on October 27, 2022, to safeguard the privacy of the individual depicted in the photograph, because for among other reasons it is not clear the individual depicted is the individual referred to as the third person in the hotel room throughout the course of the hearing.

DATED and FILED: October 28, 2022

Respectfully submitted,

GREGOR | WYNNE | ARNEY, PLLC

By: /s/ Michael J. Wynne

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**ATTORNEYS FOR DEFENDANTS TRUE THE  
VOTE, INC., GREGG PHILLIPS, AND  
CATHERINE ENGELBRECHT**

**CERTIFICATE OF CONFERENCE**

I certify that I have tried to confer with counsel for Plaintiff but have not received a response so we must assume Plaintiff is opposed to this motion.

By: /s/ Michael J. Wynne  
Michael J. Wynne

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this document was served upon counsel of record on this 28th day of October, 2022.

By: /s/ Michael J. Wynne  
Michael J. Wynne